FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST 6174
STOWE WOODWARD MOUNT HOPE

SUMMARY

This is the second permit for this facility.

September 2006

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6174. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to Three Rivers Regional Wastewater Plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (Revised Code of Washington [RCW] 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 Washington Administrative Code [WAC]).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A- Public Involvement Information.

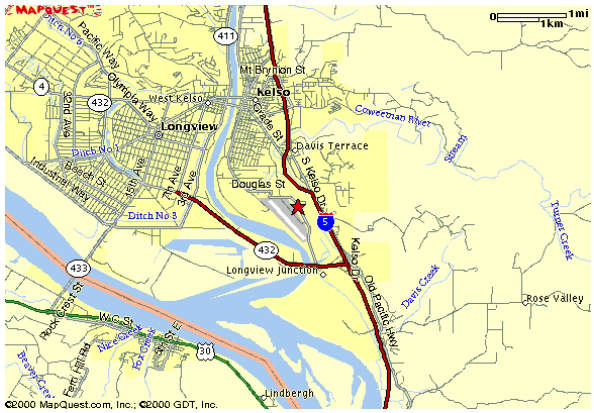
The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D- Response to Comments.

GENERAL INFORMATION	
Applicant	Stowe Woodward, LLC 1075 Everee Inn Road Griffin, GA 30224
Facility Name and Address	Stowe Woodward Mount Hope 2209 Talley Way Kelso, WA 98626
Type of Facility:	Industrial roller refurbishing and repair
Facility Discharge Location	Latitude: 46° 07' 27" N Longitude: 122° 53' 71" W.
Treatment Plant Receiving Discharge	Three Rivers Regional Wastewater Plant, Longview
Contact at Facility	Nils Sandstrom, Plant Manager, Kelso
Responsible Official	Nils Sandstrom, Plant Manager 2209 Talley Way Kelso, WA 98626 Telephone #:(360) 636-0330

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Stowe Woodward Mount Hope is an existing manufacturing facility that refinishes industrial rollers for a variety of industrial applications and repairs spreader rolls. Process wastewater and domestic sewage is discharged to the Kelso sewer system and sent to the local POTW, the Three Rivers Regional Wastewater Plant (TRRWWP), for treatment and disposal to the Columbia River.



HISTORY

The facility has operated at the current location since about 1967. At the Department's request, Stowe Woodward submitted an application in July 1997, and was issued their first permit in September 2002. During this first permit, Stowe Woodward has experienced a number of pH violations and several exceedances of total suspended solids. To correct these problems, the facility installed an additional treatment system consisting of a settling tank and pH neutralization system. This system was installed and became operational in late March 2006.

INDUSTRIAL PROCESSES

Stowe Woodward Mount Hope refinishes industrial rollers for a variety of industrial applications, from companies around the US and Canada. Two separate but related business operations exist in the same building. Stowe Woodward fabricates elastomeric roll coverings which are applied to metal rollers. Upon receipt of a roller, the existing surface coating is cut or ground off. New coatings are blended on site, which are usually natural or synthetic rubber elastomers and some are composite plastics or polyurethane elastomers. The coating is bonded to the metal roll body, finished to produce a smooth surface, then drilled or grooved as required before being returned to the customer. This accounts for about 90 percent of their business.

The Mount Hope side of the business refurbishes coated or non-coated curved rollers, including brackets, bearings, housings, and rubber sleeves. A rubber coating is then generally attached. Mount Hope accounts for about 10 percent of the total business.

Applicable Standard Industrial Classification (SIC) Codes include SIC 3069 (NAICS 326299) Rubber Product Manufacturing, and, secondarily, SIC 3554 (NAICS 333291) Paper Industry Machinery Manufacturing. The facility is subject to Categorical Pretreatment Standards. The discharge flowrate is less than 25,000 gallons per day and less than five percent of the flow rate and loading of the POTW. Therefore, the facility is not a significant industrial user.

The facility operates 16 hours per day, five days per week, year around, and currently has about 37 employees.

A list of raw materials used by Stowe Woodward was included with the permit application.

TREATMENT PROCESSES

Process wastewaters are generated primarily from boiler blowdown and water treatment system backwash water, and from the wash bay. Steam from the natural gas-fired boilers is used primarily in the two autoclaves (vulcanization) to cure the elastomeric coatings on rolls. Some steam condenses and is sent to the pit. The metal rolls are cleaned with water and detergent in the wash bay. The rollers are blasted with a compound consisting of zirconia and aluminum oxide. Mixed rubber batches are cooled by a closed loop, non-contact water system. This wastewater is only discharged approximately once per year, at about 500 gallons. Also, no wastewater is generated from the Mt. Hope spreader roll repair side of the business. Domestic wastewaters discharge to the city sewer system through a separate sewer connection.

The industrial wastewaters flow by gravity into the outdoor in-ground sump. This sump provides some solids settling and grease collection, prior to discharge out the inverted outlet pipe and out to the street

connection on Talley Way. The wastewater pretreatment system engineering report (AEI, March 2005) was received March 9, 2005, and approved April 19, 2005. This report describes the current system: two submersible pumps in the outdoor sump transfer wastewater into the nearby vulcanizer room for treatment. The two stage system consists of two 1000 gallons tanks in series: the first stage for settling and second stage for pH neutralization. The influent is pumped at 20 gpm, giving a 50 minute detention time per tank. The pH of the second tank is continuously monitored and pH is automatically adjusted with sulfuric acid via chemical feed pumps. Finally, the treated wastewater flows into a 50 gallon polyethylene tank for sampling, then by gravity into the sewer system.

Stowe Woodward's treatment system does not have a method of accurate flow measurement. To date, flow rates have been based on rough estimates, such as bucket and stopwatch. In the proposed permit, Stowe Woodward will be asked to install a more accurate flow measurement system.

PERMIT STATUS

The previous permit for this facility was issued on September 5, 2002.

An application for permit renewal was submitted to the Department on December 29, 2004, and accepted by the Department on May 18, 2005.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on April 6, 2006, to inspect the operation of the new treatment system. A previous inspection was conducted January 19, 2006.

During the history of the 2002 permit, the Permittee has not remained in compliance based on Discharge Monitoring Reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department. The biggest problem was pH, due to high pH boiler blowdown. Some exceedances of oil and grease and TSS also occurred.

pH (range 6.0-9.0): 27 exceedances of upper limit. Maximum was 11.43.

BOD (limit 250 mg/L): 3 exceedances. Maximum was 930 mg/L.

Oil and Grease (limit 150 mg/L): 3 exceedances. Maximum was 640 mg/L.

Total suspended solids (limit 250 mg/L). 6 exceedances. Maximum was 1350 mg/L (twice).

The Department issued 23 warning letters. Also, the Department issued two penalties, based on the violations noted above:

No. DE 1066 for $6,000 on April 13, 2004;
No. DE 1805 for $12,000 on January 25, 2005.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized for the following parameters:
Table 1: From section E of permit application

Parameter	Concentration	
	Maximum	Average
BOD, mg/L	102	23
TSS, mg/L	366	85
pH, std units (high, low, average)	11.05	6.98 9.8
Oil and Grease, mg/L	58	15

Table 2: Data from monthly reports, October 2002 through April 2006

Parameter	Concentration		
	Maximum	Average	Minimum
BOD, mg/L	930	49	4
TSS, mg/L	1350	114	<5
pH, standard units	Range: 11.43 – 6.4		
Oil and Grease, mg/L	640	33	4.3

Table 3: Priority pollutant scan results March 2003- from Attachment E.4 of permit application

Parameter	Concentration, ug/L
Arsenic, total	65
Chromium, total	31.8
Copper, total	130
Lead, total	12.3
Zinc, total	122
Bis(2-ethylhexyl)phthalate	15

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The minimum requirements to demonstrate compliance with the AKART standard and specific design criteria for this facility were determined in the engineering report Wastewater Pretreatment System, (AEI 2005) March 7 and April 8, 2005. This report describes a system of TSS removal and pH neutralization.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Stowe Woodward's processes are described in 40 CFR Part 428 Subpart E- Small Sized General Molded, Extruded, and Fabricated Rubber Plants. However, this category has applicable Pretreatment Standards for New Sources, but not for existing sources. Therefore, the general pretreatment standards apply as found in 40 CFR Part 403. These requirements are largely narrative, and include the following specific limits: pH no less than 5.0, and temperature less than 104 degrees F.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect Three River Regional Wastewater Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by Three Rivers Regional Wastewater Authority (TRRWA) and the City of Kelso and are codified in ordinance. Applicable limits for this discharge include the following:

Jurisdiction	Parameter	Limit	Comments
TRRWA	BOD	250 mg/L*	If exceeded, a high strength fee is applied
TRRWA	TSS	250 mg/L*	If exceeded, a high strength fee is applied
TRRWA	pH	5.5-9 std. Units*	
Cowlitz County	Temperature	150^{o} F.	At discharge to sewer
Cowlitz County	Fats, oils and grease	100 mg/L	
City of Kelso	pH	6.0-9.0 standard units	
City of Kelso	Temperature	150^{o} F.	At headworks of POTW
City of Kelso	BOD	<30 pounds/day <300 mg/L	Permission is needed to exceed.
City of Kelso	TSS	<30 pounds/day <350 mg/L	Permission is needed to exceed.

*TRRWA proposed Pretreatment Limits

AKART for Stowe Woodward is believed to be 250 mg/L BOD and TSS, 150 mg/L oil and grease, and pH of 6.0 to 9.0.

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through or hazardous exposure to POTW

workers nor will it result in unacceptable pollutant levels in the POTW's sludge. Stowe Woodward's pretreatment system should be able to achieve these local limits.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED SEPTEMBER 5, 2002

Parameter	Existing Limits	Proposed Limits
Flow, gpd	None	999
pH	Between 6.0 and 9.0	Between 6.0 and 9.0
BOD_5	250 mg/L	250 mg/L
TSS	250 mg/L	250 mg/L
Oil & Grease	150 mg/L	150 mg/L (average monthly) 100 mg/L (maximum daily)

The City of Kelso pH limits will be used, as they are the most stringent. Temperature limits will not be imposed. Due to hydraulic detention time within the pretreatment system and in-ground sump, high temperature of Stowe Woodward's discharge is not a concern. Oil and grease limit is reduced from 150 mg/L to 100 mg/L daily maximum, which is the more stringent of the applicable limits.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring for priority pollutants is being required to further characterize the effluent, once during the permit cycle.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3. are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.4. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment. The proposed permit requires submission of an updated O&M manual for the entire wastewater system, to describe proper O&M of the new settling/pH neutralization treatment system.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the solid waste plan designed to prevent solid waste from causing pollution of the waters of the state and submit it to the Department.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

SCHEDULE FOR INSTALLATION OF FLOW METER

Condition S10. in the permit requires Stowe Woodward to investigate a method of accurate flow measurement. The system is to be proposed by February 1, 2007 and be installed and operational within three months of the Department's approval.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1. requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2. requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3. specifies conditions for modifying, suspending or terminating the permit. Condition G4. requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application.

Condition G5. requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6. prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Condition G7. relate to permit renewal and transfer. Condition G8. requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G9. prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G10. requires the payment of permit fees. Condition G11. describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for five years.

REFERENCES FOR TEXT AND APPENDICES

Aware Environmental Inc., 2005. Conceptual Engineering Report: Wastewater Pretreatment System, Stowe Woodward Company Kelso Washington. March 2005.

Washington State Department of Ecology.

Laws and Regulations(http://www.ecy.wa.gov/laws-rules/index.html)

Permit and Wastewater Related Information
(http://www.ecy.wa.gov/programs/wq/wastewater/index.html

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on June 20, 2005, and June 30, 2005, in the *Daily News* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on July 31, 2006 in the *Daily News* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Region- Water Quality
PO Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least 30-days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within 30-days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone (360) 407-6286, or by writing to the address listed above.

This permit was written by Don Reif, Environmental Engineer.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control; plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring –Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99 percent confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7.0 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 percent of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C— RESPONSE TO COMMENTS

No comments were received by the Department.